

SUPPRESSED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL 18 2018

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

KOKAYI SIMMONS,

Defendants.

4:18CR00621 AGF/DDN

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about May 27, 2018, in the City of St. Peters within the Eastern District of
Missouri,

KOKAYI SIMMONS,

the Defendant herein did obstruct, delay, or affect commerce or the movement of any article or
commodity in commerce or attempt to do so by robbery of Chuck's Boots, a commercial
establishment engaged in interstate or foreign commerce and in the business of buying and
selling articles and commodities that have been previously transported in interstate or foreign
commerce.

In violation of Title 18, United States Code, Section 1951(a), and punishable under Title
18, United States Code, Section 1951(a).

COUNT TWO

The Grand Jury further charges that:

On or about May 27, 2018, in the City of St. Peters within the Eastern District of

Missouri,

KOKAYI SIMMONS,

the Defendant herein knowingly possessed and brandished a firearm, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, attempt to obstruct, delay, or affect commerce by robbery as charged in Count One herein.

In violation of Title 18, United States Code, Section 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

The Grand Jury further charges that:

On or about May 27, 2018, in the City of St. Peters within the Eastern District of Missouri,

KOKAYI SIMMONS

the Defendant herein, having been previously convicted of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, which traveled in interstate or foreign commerce during or prior to being in the Defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL

FOREPERSON

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